

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

WARNER MARSH  
Plaintiff

VS.

NEWREZ LLC D/B/A SHELL POINT  
MORTGAGE SERVICING  
Defendant

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C.A. 4:25-cv-986

**AMENDED AGREED MOTION TO REMAND**

Defendants, NewRez, LLC dba Shellpoint Mortgage Servicing, (“**Shellpoint**” or “**Defendant**”), JB Real Estate, LLC, and Plaintiff Warner Marsh (“**Plaintiff**”) file this Agreed Motion to Remand this action back to state court and would show as follows.

1. Defendant properly removed this action from state court to this Court on March 4, 2025 based on diversity grounds. On March 13, 2025, Plaintiff filed his First Amended Complaint adding a defendant, JB Real State, LLC, that is reportedly a Texas citizen for Diversity purposes. Counsel for Defendants and Plaintiff have conferred in good faith and agree this matter should now be remanded of this matter back to the 164th District Court of Harris, County, Texas where it was originally filed and seek the permission and order of this Court for such remand.

Therefore, Defendant and Plaintiff respectfully request that the present action be remanded back to the 164th District Court of Harris, County, Texas, where it was originally filed prior to removal under Cause No. 2025-13896.

Respectfully submitted,

By: /s/ Michael F. Hord Jr.

Michael F. Hord Jr.  
State Bar No. 00784294  
Federal I.D. No. 16035  
Eric C. Mettenbrink  
State Bar No. 24043819  
Federal I.D. No. 569887  
HIRSCH & WESTHEIMER, P.C.  
1415 Louisiana, 36<sup>th</sup> Floor  
Houston, Texas 77002-2772  
713-220-9182 Telephone  
713-223-9319 Facsimile  
Email: mhord@hirschwest.com  
Email: emettenbrink@hirschwest.com

**ATTORNEYS FOR NEWREZ, LLC**

By: /s/ Finis Cowan

Finis Cowan  
Texas Bar No. 04912100  
COWAN LAW FIRM  
One Greenway Plaza  
Suite 100  
Houston, Texas 77046  
(832) 341-4599 Telephone  
(713) 561-3692 Facsimile  
[Service@TexasDebtDefense.com](mailto:Service@TexasDebtDefense.com)

**ATTORNEYS FOR JB REAL ESTATE LLC**

By: /s/ Robert C. Vilt

Robert C. Vilt  
Texas Bar No. 00788586  
Federal I.D. No. 20296  
Vilt and Associates, P.C.  
5177 Richmond Avenue, Suite 1142  
Houston, Texas 77056  
(713) 840-7570 Telephone  
(713) 877-1827 Facsimile  
[cvilt@viltlaw.com](mailto:cvilt@viltlaw.com)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7th day of April, 2025, a true and correct copy of this Agreed Motion to Remand has been served in accordance with **Federal Rule of Civil Procedure 5(b)** to the following:

Robert C. Vilt  
Vilt and Associates, P.C.  
5177 Richmond Avenue, Suite 1142  
Houston, TX 77056  
**Via ECF**

Finis Cowan  
Cowan Law Firm  
One Greenway Plaza, Suite 100  
Houston, TX 77046  
**Via ECF**

/s/ Michael F. Hord Jr.

Michael F. Hord Jr.